REMARKS

Claims 1-7, 14-20 and 27 are pending in the present application. Claims 5 and 18 are canceled and claims 1, 14, and 27 are amended. Claims 1, 14, and 27 contain the content of claims 5 and 18. Support for the amendments to independent claims 1, 14 and 27 may be found at least on page 7, lines 13-31, on page 11, lines 14-29, on page 13, lines 17-28, and on page 14, lines 15-21. Reconsideration of the claims is respectfully requested.

I.   Telephone Interview

Applicants thank Examiner Jalatee Worjloh for the courtesies extended to Applicants' representative during the June 16, 2005 telephone interview. During the interview, Applicants' representative discussed the distinctions between proposed amendments to the independent claims and the *Shmueli* and *Angelo* references. Examiner Worjloh stated that the proposed amendments and additional amendments clarifying the word "resource" as hardware may overcome the cited references. Further analysis will be required. The substance of the telephone interview is summarized in the following remarks.

II.   35 U.S.C. § 112, Second Paragraph

The Office Action rejects claims 5 and 18 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. This rejection is respectfully traversed.

The Office Action states:

> Notice, claim 5, which depends on claim 1, teaches decrypting the mobile input; however, claim 1 does not clearly disclose encrypted mobile input. Also, claim 18, which depends on claim 14, teaches the controller decrypting the mobile input, but therefore is no encryption process taught in claim 14.

Office Action dated March 21, 2005, page 2.

Claims 5 and 18 are canceled. Therefore, the rejection of claims 5 and 18 under 35 U.S.C. § 112, second paragraph has been overcome.

III. 35 U.S.C. § 102, Alleged Anticipation Based on *Shmueli*

The Office Action rejects claims 1-4, 6, 7, 14, 15, 17, 19, 20, and 27 under 35 U.S.C. § 102(e) as being allegedly anticipated by *Shmueli et al.*, U.S. Patent Application Publication Number 2002/0147653 A1, hereinafter referred to as *Shmueli*. This rejection is respectfully traversed.

As to independent claims 1, 14 and 27, the Office Action states:

> Shmueli et al. disclose presenting at least one authentication information field for accessing a resource, receiving mobile input including authentication information from a mobile device, converting the mobile input to keyboard input and entering the keyboard input into the at least one authentication information field to access the resource (see paragraph [0010], lines 1-6). Notice, the step of converting the mobile input to keyboard input is an inherent step. That is, when the authentication information is received it is automatically inputted into the web set for access. Before automatically inputting the information it must have been previously converted into the proper format. ...
>
> Referring to claim 14, Shmueli et al. disclose a display interface (i.e. monitor of the host computer), a mobile device interface (i.e. "key interface") a controller (i.e. "CPU"), coupled to the display interface and the mobile interface, wherein the controller presents at least one authentication information field for accessing a resource; receives mobile input including authentication information from a mobile device; converts the mobile input to keyboard input; and enters the keyboard input into the at least one authentication information field to access the resources (see paragraphs [0024], lines 3-5; [0025], lines 4 & 5; [0027]; [0010], lines 1-6). ...
>
> Referring to claim 27, Shmueli et al. disclose instructions (i.e. software and data for operation) for: presenting at least one authentication information field for accessing a resource, receiving mobile input including authentication information from a mobile device, converting the mobile input to keyboard input and entering the keyboard input into the at least one authentication information field to access the resource (see paragraphs [0027], lines 1-67 and [0010], lines 1-6).

Office Action dated March 21, 2005, pages 3-4.

As amended, claim 1, which is representative of the other rejected independent claims 14 and 27 with regard to similarly recited subject matter, reads as follows:

> 1. A method for authenticating a user, comprising:
> presenting at least one authentication information field for accessing a terminal;
> receiving mobile input including authentication information from a mobile device, wherein a keyboard device driver on the terminal is configured to receive user input from a keyboard and to receive the mobile input from a mobile device interface, and wherein the mobile input is encrypted;

    <u>converting the mobile input to keyboard input, wherein the keyboard device driver decrypts the mobile input;</u> and

        entering the keyboard input into the at least one authentication information field to access the terminal. (emphasis added)

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). Applicants respectfully submit that *Shmueli* does not identically show every element of the claimed invention arranged as they are in the claims. Specifically, *Shmueli* does not teach or suggest "receiving mobile input including authentication information from a mobile device, wherein a keyboard device driver on the terminal is configured to receive user input from a keyboard and to receive the mobile input from a mobile device interface, and wherein the mobile input is encrypted" and "converting the mobile input to keyboard input, wherein the keyboard device driver decrypts the mobile input."

    Shmueli is directed to a portable device containing software adapted to execute on and instruct a host computing device. When executing the software, the host computing device may recognize financial account fields in a web page during a browsing session and automatically fill these fields with financial account information stored on the portable device to facilitate a web-based transaction. The portable device may contain information relating to multiple financial accounts. See *Shmueli*, abstract. *Shmueli* does not teach or suggest "receiving mobile input including authentication information from a mobile device, wherein a keyboard device driver on the terminal is configured to receive user input from a keyboard and to receive the mobile input from a mobile device interface, and wherein the mobile input is encrypted" and "converting the mobile input to keyboard input, wherein the keyboard device driver decrypts the mobile input," as recited in claims 1, 14 and 27.

    The Office Action refers to the following portions of *Shmueli* in the rejection of independent claims 1, 14 and 27:

[0010] The present invention may also store login information, such as user names and passwords for one or more web sites on the portable device. Upon entry to the web site, the software will preferably recognize login fields and automatically fill in the fields with the login information when entering the web site. Bookmark information may also be stored on the portable device. Further, the portable device may include software providing further instructions for the host computing device to make the bookmarks accessible by a browser program running on the host computing device. As such, the user may use the favorite bookmarks kept on the portable device to efficiently access web sites during a browsing session.

Shmueli, paragraph [0010].

[0024] With reference to FIG. 1, a basic representation of a computing environment consistent with the implementation of the present invention is illustrated. At the heart of the invention is the portable memory device, which is referred to as a key 10. The key 10 is configured to interact with any number of computing devices, which are referred to as hosts 12. Each host 12 will typically interact with one or more servers 14 via a network 16, which may include a local area network (LAN), the Internet, or a combination thereof.

Shmueli, paragraph [0024].

[0025] The key 10 will primarily include memory 18 having software 20 capable of running on one of the hosts 12, and data 22. The memory 18 will be associated with a key interface 24 to facilitate an interface with one or more of the hosts 12. Although the key 10 is primarily a memory device, the key may include control circuitry to assist in interaction with the host as well as organizing the data 22. Preferably, once an interaction between the key 10 and a host 12 is established, the memory 18 will emulate a file system on a memory device, such as a hard disk drive, accessible by the host 12 wherein at least certain aspects of the software 20 are capable of running or executing on the host 12.

Shmueli, paragraph [0025].

[0027] The host 12 may take many forms, including a personal computer (PC), workstation, personal digital assistant (PDA), notebook computer, web-enabled mobile telephone, or the like. The host 12, regardless of form, will typically include a central processing unit (CPU) 26 associated with memory 28 having the requisite software 30 and data 32 for operation. Typically, a user interface 34 is provided to facilitate interaction with the host's user, which is preferably the owner of the key 10, who is interacting with the host 12. The CPU 26 is preferably associated with a key interface 36 to facilitate interaction with the key 10, and a network interface 38 to facilitate interaction with any number of devices associated with network 16, such as the servers 14.

Shmueli, paragraph [0027].

These portions of *Shmueli* teach storing login information, such as user names and passwords for one or more web sites on the portable device. Upon entry to the web site, the software on the portable device will preferably recognize login fields and automatically fill in the fields with the login information when entering the web site. *Shmueli* does not teach or suggest that a keyboard device driver on the terminal is configured to receive user input from a keyboard and to receive the mobile input from a mobile device interface. Additionally, these portions of *Shmueli* do not mention that the mobile input is encrypted and that the keyboard device driver decrypts the mobile input. Claims 1, 14 and 27 recite "receiving mobile input including authentication information from a mobile device, wherein a keyboard device driver on the terminal is configured to receive user input from a keyboard and to receive the mobile input from a mobile device interface, and wherein the mobile input is encrypted" and "converting the mobile input to keyboard input, wherein the keyboard device driver decrypts the mobile input." *Shmueli* does not teach or suggest these features.

In view of the above, Applicants respectfully submit that *Shmueli* does not teach each and every feature of independent claims 1, 14 and 27, as is required under 35 U.S.C § 102(e). Therefore, *Shmueli* does not teach each and every feature of dependent claims 2-4, 6, 7, 15, 17, 19, and 20 at least by virtue of their dependency on claims 1 and 14, respectively. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-4, 6, 7, 14, 15, 17, 19, 20, and 27 under 35 U.S.C § 102(e).

IV.   35 U.S.C. § 103, Alleged Obviousness Based on *Shmueli* and *Angelo*

The Office Action rejects claims 5 and 18 under 35 U.S.C. § 103(a) as being allegedly unpatentable over *Shmueli* in view of *Angelo et al.* (U.S. Patent Number 5,953,422), hereinafter referred to as *Angelo*. This rejection is respectfully traversed.

Claims 5 and 18 are canceled. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 5 and 18 under 35 U.S.C. § 103(a).

The content of canceled claims 5 and 18 is incorporated into independent claims 1, 14 and 27. As discussed above, *Shmueli* does not teach or suggest the features as recited in amended independent claims 1, 14 and 27. In addition, *Angelo* does not provide for the deficiencies of *Shmueli* with regard to independent claims 1, 14 and 27.

Angelo is directed to a computer system incorporating a two-piece authentication procedure for securely providing user authentication over a network. *Angelo* is cited for disclosing decrypting mobile input. *Angelo* does not teach or suggest "receiving mobile input including authentication information from a mobile device, wherein a keyboard device driver on the terminal is configured to receive user input from a keyboard and to receive the mobile input from a mobile device interface, and wherein the mobile input is encrypted" and "converting the mobile input to keyboard input, wherein the keyboard device driver decrypts the mobile input." Thus, any alleged combination of *Angelo* with *Shmueli* still would not result in the invention recited in claims 1, 14 and 27.

The Office Action refers to the following portion of *Angelo*:

> A computer system incorporating a two-piece authentication procedure for securely providing user authentication over a network. In the disclosed embodiment of the invention, a user password is entered during a secure power-up procedure. The user password is encrypted by an external token or smart card that stores an encryption algorithm furnished with an encryption key that is unique or of limited production. A network password is thereby created. The network password is maintained in a secure memory space such as System Management Mode (SMM) memory. The network password is then encrypted and communicated over the network. The network password may be encrypted using the server's public key or another key that is known to the server. Optional node identification information is appended to the network password prior to communication over the network. Once received by the server, the encrypted network password is decrypted using the server's private key. A user verification process is then performed on the network password to determine which, if any, access privileges have been accorded the network user.

Angelo, abstract.

This portion of *Angelo* only teaches that an encrypted network password is decrypted using the server's private key. *Shmueli* and *Angelo*, taken alone or in combination, do not teach or suggest "receiving mobile input including authentication information from a mobile device, wherein a keyboard device driver on the terminal is configured to receive user input from a keyboard and to receive the mobile input from a mobile device interface, and wherein the mobile input is encrypted" and "converting the mobile input to keyboard input, wherein the keyboard device driver decrypts the mobile input," as recited in claims 1, 14 and 27.

V.   35 U.S.C. § 103, Alleged Obviousness Based on *Shmueli*

The Office Action rejects claim 16 under 35 U.S.C. § 103(a) as being allegedly unpatentable over *Shmueli*. This rejection is respectfully traversed.
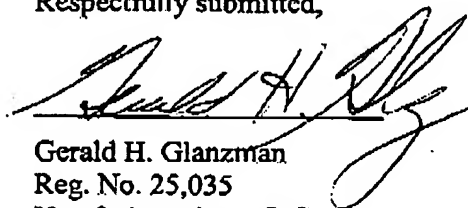
As discussed above, *Shmueli* does not teach or suggest the features as recited in amended independent claim 14. Therefore, *Shmueli* does not teach or suggest the features of dependent claim 16 at least by virtue of its dependency on independent claim 14. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 16 under 35 U.S.C. § 103(a).

VI.   Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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